

<sup>1</sup> Public Notice, Comment Deadline Established Regarding the LightSquared Technical Working Group Report, DA 11-1133, IB Docket No. 11-109 (June 30, 2011) ("TWG Report Comment Request").

sites while investing over \$40M in rural America and has the need and desire to remain competitive with the large national carriers by developing a cost effective 4G solution as soon as possible.

In order for SI Wireless to provide the service that customers expect and to compete effectively with major and dominant carriers with larger areas of coverage, it is essential that SI Wireless be able to offer access to 4G services in areas that fall outside of SI Wireless' footprint. There are enormous obstacles for smaller carriers such as SI Wireless in the current market, which is highly concentrated. Smaller carriers face difficulties in securing data roaming arrangements at reasonable rates and, because of the anti-competitive effects of handset exclusivity agreements entered into by the dominant nationwide carriers, are denied access to popular handset models.

LightSquared's proposed 4G LTE network and wholesale-only business model segues perfectly into SI Wireless' customer and business requirements. It would allow SI Wireless access to essential services for its customers from a network operator that SI Wireless does not have to compete against at the retail level and that does not restrict device options available for use on its network. This, in turn, will put SI Wireless in a far better position to offer state of the art services to its customers wherever they may travel and enable it to compete more effectively in a wireless market in which users increasingly demand access to nationwide services.

SI Wireless is a newcomer to the market and is new to FCC spectrum management issues and policies. As a new entrant, SI Wireless finds itself mystified as to how the GPS industry can claim rights to spectrum to which it is not licensed; how it can design receivers that are incapable of filtering out signals on frequencies even 23 MHz away from the band in which it operates and then seek to avoid taking any responsibility for the consequences; or how it can express surprise

in 2011 that LightSquared will be deploying a terrestrial L-band network when these plans have been public for years. If the GPS industry has answers to these questions, SI Wireless has not seen them.

Further, SI Wireless does not understand why the making of such claims by the GPS industry can or should be permitted to continue to delay deployment of LightSquared's broadband network, when there is such a public need and demand for its services. With respect to this timing issue, SI Wireless wishes to make clear to the Commission that the need for LightSquared's 4G LTE services on a wholesale-only broadband network is now, not later. Accordingly, SI Wireless respectfully requests the Commission act expeditiously to permit LightSquared to go forward with the deployment of its terrestrial network, as it has proposed.

Respectfully submitted,

SI WIRELESS

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